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*Attorneys for Defendants*  
*C. R. Bard, Inc. and*  
*Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF  
LODGING UNDER SEAL CERTAIN  
EXHIBITS IN SUPPORT OF  
BARD'S MOTION FOR SUMMARY  
JUDGMENT AS TO PLAINTIFF  
DEBRA MULKEY'S CLAIMS**

DEBRA MULKEY, an individual,

Plaintiff,

v.

C. R. BARD, INC., a New Jersey  
corporation and BARD PERIPHERAL  
VASCULAR, INC., an Arizona  
corporation,

Defendants.

(Assigned to the Honorable David G.  
Campbell)

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Bard”), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6, file this Notice of Lodging Under Seal certain exhibits attached in support of Bard’s Motion for Summary Judgment as to Plaintiff Debra Mulkey’s Claims. These exhibits—as well as portions of Bard’s Separate Statement of Facts that quote, reference, or characterize them (which Bard is lodging in redacted form)—contain Plaintiff’s personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order. Defendants have notified Plaintiff of their intent to file this Notice of Lodging. Because the documents lodged under seal and materials lodged redacted only relate to Plaintiff’s personal healthcare information, Defendants note that it is Plaintiff’s burden to file a motion to seal. A list of the exhibits lodged under seal, and a list of materials lodged redacted, are attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED this 28th day of August, 2017.

s/Richard B. North, Jr.  
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**Attorneys for Defendants C. R. Bard, Inc. and  
 Bard Peripheral Vascular, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of August 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.  
Richard B. North, Jr.

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**EXHIBIT A**

**DOCUMENTS LODGED UNDER SEAL**

Defendants request they be permitted to lodge under seal the following documents in support of their Motion for Summary Judgment as to Plaintiff Debra Mulkey's Claims:

- Exhibit A: Excerpts of Plaintiff Debra Mulkey's Plaintiff Fact Sheet
- Exhibit C: Excerpts from April 11, 2017 Deposition of Dr. Roderick Tompkins
- Exhibit D: Selected Medical Records of Plaintiff Debra Mulkey
- Exhibit E: Excerpts from February 8, 2017 Deposition of Plaintiff Debra Mulkey
- Exhibit F: Excerpts from July 21, 2017 Deposition of Dr. Darren Hurst
- Exhibit G: Excerpts from July 24, 2017 Deposition of Dr. Derek Muehrcke

**DOCUMENTS PROPOSED TO BE LODGED REDACTED**

Defendants request they be permitted to lodge redacted portions of the following documents:

Defendant's Separate Statement of Facts in Support of Motion for Summary Judgment as to Plaintiff Debra Mulkey's Claims